

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CHERYL SAGATAW, DEANTHONY  
BARNES, ROBERTA STRONG, and  
TRAVIS NELOMS, *on behalf of  
themselves and a class of  
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his  
individual and official capacity,*

Defendant.

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Civil Action No.  
0:24-cv-00001-ECT/TNL

**DECLARATION OF  
TRAVIS NELOMS  
IN SUPPORT OF SECOND  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

**DECLARATION OF TRAVIS NELOMS**

I, TRAVIS NELOMS, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Travis Neloms and I am 34 years old.
2. I'm Native Puerto Rican and African American and I have multiple mental health diagnoses and a broken ankle.
3. I grew up in Wisconsin but moved around a lot, I was in foster care since a young age, lived on Menominee reservation and in Milwaukee, Beloit, different places for a while. I was at Rawhide Boy's Ranch for a little bit. I ran away a few times, once to the Menominee reservation to live with friends, and other times just out and about. I lived with different family and friends for a while.
4. I ended up in Minneapolis because my mom moved here in 2010 to access treatment at the Mayo. My mom had cancer. I moved here in 2012 to be with her. I was living with her at first and then my sister. Then I became homeless. I haven't been able to get housing. I have a housing worker, but he doesn't come find me, he is not nice to me, I feel like he doesn't do his job to help me get housing. He's putting it all on me, as someone with a lot of mental health issues, to get housing, when he is the one with the connections and knows how to do it.
5. I started living with this group of people a long time ago, years and years. We were by Franklin, where all the bricks are now, and then at the Wall of Forgotten Natives in 2018, and then from encampment to encampment.
6. I didn't find Nenookaasi, Nenookaasi found me. Stuff like this you don't find, it comes along and it calls you. Everyone has their reasons for being here.
7. Being here is different, it's not what I am used to in life. It's a different type of feeling. It makes you want to actually better yourself. It's a group of people who are all going through the same thing but still here for each other.
8. I'm at Nenookaasi and not a shelter because shelters have curfews, rigid rules, I get sick when I stay there. I stayed at the Salvation Army downtown and I got sick from being there. They have bunk beds, no privacy, everyone steals from each other, hygiene is really bad. I got sick at Mary Jo's shelter from eating their food. I don't know what it was, I think the meat was bad.
9. Here's better than being out on the streets too because there is safety in numbers.

10. I have stability at camp because I can hold onto more items, clothing. I share a yurt here, and I am able to store stuff in it. Like a bike, clothes, my seizure medication which on the street I was never able to keep.
11. I was briefly in a housing program called Agate, but I didn't like their living situation, you have to share a room and the way it was set up was all wrong, it was just odd, I felt uncomfortable there. My case manager there hadn't even put me in the system and wasn't helping me get permanent housing so I felt uncomfortable being there like they just wanted to keep me there. Plus you couldn't have company visit you, it was isolating. So I came back outside onto the streets.
12. I've been through a lot of evictions. Sometimes we wouldn't have any notice, they would just show up and tell us we had to leave. One time we had a 24 hour notice to pack up our stuff and leave. Sometimes the city workers would tell us we had to leave and pack up our stuff and then we could come back, a few of them would sympathize with us and what we were going through. The cops couldn't care less about what we were going through. Some of them are unsympathetic, some of them are rude, some of them don't even do their jobs, some of them would steal our possessions from us. I've had numerous bicycles taken by cops, if I couldn't prove where I'd gotten it from. Sometimes people give us nice things, but then the cops see homeless people with nice things and assume we stole them so they take the nice things from us. Cops mostly look at us all like criminals hiding away from them. Really I'm just a citizen going through life. Not everyone has the mental capacity to get everything in order. Some of us are going through life one step at a time, and we can only figure out day by day what we can do, like "today I am going to survive."
13. Evictions put a hold on the day, everything goes out the window except getting through it, you have to figure out where you're going to put your stuff, who is going to watch it, if you can trust the person who is going to watch it, where to find a new place to put your tent.
14. During the summer when we were staying behind Taco Bell on Cedar, the cops came by with a flyer saying they were giving away storage downtown. But they didn't even explain where it was. We started figuring out more about it but realized there were all sorts of limits and it wasn't usable. Basically no one uses it. I haven't seen any flyers since then.
15. I never went to look into it because the storage downtown doesn't seem realistic or safe to me, there is a limit to how much we can store, it would mean the cops going through our stuff, plus it's not feasible because we need access to things every day like our clothes and other possessions. It's not a storage situation at a private facility, its run by the cops. Nobody trusts it, and it wouldn't be useful anyway.

16. After George Floyd protests calmed down, the cops have gone back to their “big bad wolf” thing. They see homeless people as the issue. The day my friend got injured at the encampment on 26th St, a few weeks ago, the cops got called, they came not to help but to insult us. They said “we don’t want to go in there because of the sickness” but then they wouldn’t let me go check on my friend either.
17. Since December, I haven’t seen anyone offering storage.
18. The city helping people at evictions is a laughing matter. They just try to figure out how to keep us from having an encampment, they are not trying to help people store their things, transport elsewhere, or have a place to sleep at night.
19. Not many shelter beds are available when evictions happen. I don’t call to try to get a spot, I am too busy helping people pack and get their stuff together. I’ve gotten so used to this that its just what I jump to do. I just jump into helping. Packing, move stuff, take stuff to other places, we only have a certain amount of time and then after that cops get to be really harsh, we have to leave behind the rest of our things.
20. Because of this rush, I’ve lost thousands of dollars worth of clothes, bikes, tents, blankets, medications, court paperwork, drivers license, social security card, birth certificate, all types of stuff. Now it's been a struggle for me to even pay to get my drivers license back, it takes a long time to save up to get these documents back. I had to jump through a lot of hoops to start to rebuild all these documents and I still haven’t gotten my license back.
21. The repeated evictions make me feel like people aren’t really trying to understand the situation, they just want it to be over and done with.
22. I haven’t paid too much attention to what people say negatively about us, I know that people don’t understand, they won’t understand, and they aren’t going to take the time to understand. They keep finding problems to talk about. People say the camp brings crime but there’s crime everywhere. There’s more Bob beating his wife in the suburbs than there are people having problems in this camp. This camp is peaceful compared to out there.
23. If this camp got evicted, I wouldn’t have anywhere to go aside from trying to find somewhere else to put a tent down. I’d have to go through day by day hiding my stuff, picking it back up again at night. My mom doesn’t have a place anymore so I can’t leave my stuff with my mom during the day.
24. I’m doing this declaration because I want to help share our point of view as residents of this camp.

I declare under penalty of perjury that this declaration is true and correct.

Executed on Feb. 6, 2024, in the City of Minneapolis, County of Hennepin, State of Minnesota,  
Treaty-Ceded Territory of the Dakota peoples.

A handwritten signature in black ink, appearing to read "Travis Neloms", written over a horizontal line.

TRAVIS NELOMS